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LAW OFFICES OF NEIL B. CHECKMAN, ESQ.

December 14, 2016

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Ex parte

By regular mail and ECF

**Re: United States v. Michelle Morton, et al.,
16 Cr. 371 (RA)**

Dear Judge Abrams:

I am the attorney appointed pursuant to the Criminal Justice Act to represent Michelle Morton on the above-referenced Indictment. On October 4, 2016, I asked the Court to approve the retention of my associate, Gerald Ryan, Esq. At the rate of \$90.00 per hour to perform 100 hours of professional services due to the voluminous discovery materials in this case. The Court approved that application.

As of this Tuesday, Mr. Ryan has completed over 80 hours of professional services in assisting counsel in reviewing the tens of thousands of pages of discovery material. Both your undersigned and Mr. Ryan have substantial amounts of Rule 16 discovery materials to continue to review, as well as the preparation of a time line in order to properly represent Ms. Morton on this case.

Accordingly, I respectfully request that the Court authorize Mr. Ryan to perform an additional 100 hours of professional services.

Hon. Ronnie Abrams
December 14, 2016
Page 2

We thank the Court for considering this application.

Very truly yours,

A handwritten signature in black ink, reading "Neil B. Checkman". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Neil B. Checkman

/NBC

cc: Gerald B. Ryan, Esq. (In person)
Michelle Morton (In person)